

# EXHIBIT 6

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

SOLAS OLED LTD.,

*Plaintiff,*

v.

SAMSUNG DISPLAY CO., LTD., et al.,

*Defendants.*

Case No. 2:19-cv-00152-JRG

**PLAINTIFF SOLAS OLED LIMITED'S SECOND AMENDED  
DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT  
CONTENTIONS**

Pursuant to P.R. 3-1 and P.R. 3-2, patent owner Solas OLED Limited hereby provides its first amended disclosure of asserted claims and infringement contentions and its accompanying document production. This disclosure is based on the information available to Solas as of the date of this disclosure, before Solas has received any discovery on the design or operation of the defendants' products. Solas reserves the right to amend this disclosure to the full extent permitted under the court's rules and orders.

**I. P.R. 3-1: DISCLOSURE OF ASSERTED CLAIMS AND  
INFRINGEMENT CONTENTIONS**

**A. P.R. 3-1(a): Asserted Claims**

Solas asserts that defendants Samsung Display Co., Ltd.; Samsung Electronics America, Inc.; and Samsung Electronics Co., Ltd. (collectively "Samsung") infringe one or more of the following claims, directly, by inducement, by contributory infringement:

<i>U.S. Patent No.</i>	<i>Asserted Claims</i>
6,072,450	1, 4–6, 8, 12, 13, 15, 16
7,446,338	1, 5, 6, 9, 10
9,256,311	1, 2, 4–8, 10–13, 15, 16, 18–20

Collectively, these three patents are referred to herein as the Asserted Patents, and these claims as the Asserted Claims.

**B. P.R. 3-1(b): Accused Instrumentalities of Which Solas Is Aware**

In this section, Solas provides lists of accused products that Solas is aware of infringing based upon information presently available to it and its investigation to date. Solas’s infringement claims are not limited to these listed products and specifically extend to all products and apparatuses of Samsung similar to the listed products that include the claimed elements. Unless otherwise stated, Solas’s infringement assertion apply to all variations, versions, editions, and applications of each of the listed products.

**1. U.S. Patent No. 6,072,450**

Solas accuses the following Samsung products that it is presently aware of infringing each of the Asserted Claims of the ’450 patent:

Samsung Galaxy S4  
Samsung Galaxy S5  
Samsung Galaxy S6  
Samsung Galaxy S6 Edge  
Samsung Galaxy S6 Edge+  
Samsung Galaxy S7  
Samsung Galaxy S7 Edge  
Samsung Galaxy S8  
Samsung Galaxy S8+  
Samsung Galaxy Note 3  
Samsung Galaxy Note 3 Neo  
Samsung Galaxy Note 4

Samsung Galaxy Note Edge  
Samsung Galaxy Note 5  
Samsung Galaxy Note 7  
Samsung Galaxy Note 8

In addition, Solas accuses the Organic Light-Emitting Diode (OLED) displays made and sold by Samsung and utilized in the following third-party products that it is presently aware of infringing each of the Asserted Claims of the '450 patent:

Apple MacBook Pro with OLED Touch Bar  
Dell Venue 8 7000 series  
Sony PlayStation VR

The Samsung products—and the Samsung displays contained in the third-party products—in the preceding two lists; all variations, editions, and applications of the foregoing; and all products and apparatuses of Samsung similar to the foregoing that include the claimed elements are the '450 Accused Instrumentalities.

## **2. U.S. Patent No. 7,446,338**

Solas accuses the following Samsung products that it is presently aware of infringing each of the Asserted Claims of the '338 patent:

Samsung Galaxy S4  
Samsung Galaxy S5  
Samsung Galaxy S6 Edge+  
Samsung Galaxy S8  
Samsung Galaxy S8+  
Samsung Galaxy S9  
Samsung Galaxy S9+  
Samsung Galaxy Note 3  
Samsung Galaxy Note 4  
Samsung Galaxy Note Edge  
Samsung Galaxy Note 5  
Samsung Galaxy Note 8  
Samsung Galaxy Note 9

In addition, Solas accuses the Organic Light-Emitting Diode (OLED) displays made and sold by Samsung and utilized in the following third-party products that it is presently aware of infringing each of the Asserted Claims of the '338 patent:

Apple iPhone X  
Apple iPhone XS  
Apple iPhone XS Max  
Apple iPhone 11 Pro  
Apple iPhone 11 Pro Max

The Samsung products—and the Samsung displays contained in the third-party products—in the preceding two lists; all variations, editions, and applications of the foregoing; and all products and apparatuses of Samsung similar to the foregoing that include the claimed elements are the '338 Accused Instrumentalities.

**3. U.S. Patent No. 9,256,311**

Solas accuses the following Samsung products that it is presently aware of infringing each of the Asserted Claims of the '311 patent:

Samsung Galaxy S6 Edge  
Samsung Galaxy S6 Edge+  
Samsung Galaxy S7 Edge  
Samsung Galaxy S8  
Samsung Galaxy S8+  
Samsung Galaxy S9  
Samsung Galaxy S9+  
Samsung Galaxy S10  
Samsung Galaxy S10+  
Samsung Galaxy S10e  
Samsung Galaxy S10 5G  
Samsung Galaxy Note 8  
Samsung Galaxy Note 9  
Samsung Galaxy Note 10  
Samsung Galaxy Note 10+  
Samsung Galaxy S20  
Samsung Galaxy S20+  
Samsung Galaxy S20 Ultra  
Samsung Galaxy Z Flip

The Samsung products—and the Samsung displays contained in the third-party products—in the preceding two lists; all variations, editions, and applications of the foregoing; and all products and apparatuses of Samsung similar to the foregoing that include the claimed elements are the '311 Accused Instrumentalities. The '450 Accused Instrumentalities, '338 Accused Instrumentalities, and '311 Accused Instrumentalities collectively are the Accused Instrumentalities.

**C. P.R. 3-1(c): Claim Charts**

Solas's analysis of Samsung's products and apparatuses is based upon information that is publicly available and based on Solas's own investigation prior to any discovery in this action.

While the publicly available information constitutes evidence of the methods and apparatuses used by Solas in the Accused Instrumentalities, direct evidence of the actual apparatuses and methods are at times not publicly available. Accordingly, these infringement contentions are based on the available public information, laboratory analysis and reasonable inferences drawn from that information.

Solas reserves the right to amend or supplement these disclosures for any of the following reasons (along with any other reason that may be permitted under the court's rules and orders):

- (1) Samsung provides evidence of the apparatuses and methods used in the Accused Instrumentalities;
- (2) The Asserted Claims may include elements that involve features that are implemented by hardware structures and logic and Solas's current positions on infringement are set forth without the benefit of access to Defendant's source code, schematics, drawings, or other proprietary specifications

or information, which cannot be obtained through publicly available information, for the Accused Instrumentalities. Therefore, it may be necessary for Solas to supplement its positions on infringement after a complete production of such proprietary specifications or information by Samsung;

- (3) Solas's position on infringement of specific claims will depend on the claim constructions adopted by the Court. Because said constructions have not yet occurred, Solas cannot take a final position on the bases for infringement of the Asserted Claims; and
- (4) Solas's investigation and analysis of Samsung's Accused Instrumentalities are based upon information made publicly available by Samsung and by Solas's own investigations. Solas reserves the right to amend these contentions based upon discovery of non-public information that Solas anticipates receiving from Samsung during discovery.

Attached as Exhibits A through C, and incorporated herein in their entirety, are charts identifying where each element of the Asserted Claims of the '450, '338, and '311 patents are found in the Accused Instrumentalities.

Unless otherwise indicated, the information provided that corresponds to each claim element is considered to indicate that each claim element is found within each of the different variations, versions, editions, and applications of each respective Accused Instrumentalities.

#### **D. P.R. 3-1(d): Literal Infringement and Doctrine of Equivalents**

With respect to the patents at issue, Solas contends that each element of each Asserted Claim is literally present. In the alternative, Solas contends that certain elements are present under the doctrine of equivalents, as set forth in its P.R. 3-1(c)

claim charts. To the extent that Samsung identifies elements of the Asserted Claims that it contends are not literally present in the Accused Instrumentalities, Solas contends that such elements are present under the doctrine of equivalents.

**E. P.R. 3-1(e): Priority Dates**

<i>U.S. Patent No.</i>	<i>Priority Date</i>
6,072,450	November 28, 1996
7,446,338	September 29, 2004
9,256,311	October 28, 2011

**F. P.R. 3-1(f): Identification of Instrumentalities Practicing the Claimed Invention**

Solas does not presently assert that its own apparatuses, products, devices, processes, methods, acts, or other instrumentalities practice the claimed inventions. Solas reserves the right to supplement this response should further investigation, discovery, or the court's claim construction rulings make such supplementation appropriate.

**II. P.R. 3-2: DOCUMENT PRODUCTION ACCOMPANYING DISCLOSURE**

**A. P.R. 3-2(a) Documents**

Solas is presently unaware of any documents that evidence any discussion with, disclosure to, or other manner of providing to a third party, or sale of or offer to sell, any of the inventions claimed in the asserted patents prior to their respective application dates.

A diligent search continues for documents, and Solas reserves the right to supplement this response.

**B. P.R. 3-2(b) Documents**

Solas is presently unaware of any documents that evidence the conception, reduction to practice, design, or development of the claimed inventions, which were created on or before the application dates of the '450 or '338 patents or their respective priority dates identified pursuant to P.R. 3-1(e).

Solas is presently aware that certain documents exist which evidence the conception, reduction to practice, design, or development of the claimed inventions of the '311 patent and which were created on or before the application dates of the '311 patent. These documents include at least documents produced in this case bearing the following Bates numbers:

SOLAS_SAMSUNG_0003750- SOLAS_SAMSUNG_0003752;YILMAZ_00000017-YILMAZ_00000019
SOLAS_SAMSUNG_0003754;YILMAZ_00000020
SOLAS_SAMSUNG_0003753;YILMAZ_00000021
SOLAS_SAMSUNG_0005660- SOLAS_SAMSUNG_0005664;YILMAZ_00000166-YILMAZ_00000170
SOLAS_SAMSUNG_0005665;YILMAZ_00000171
SOLAS_SAMSUNG_0005577;YILMAZ_00000083
SOLAS_SAMSUNG_0005578;YILMAZ_00000084
SOLAS_SAMSUNG_0005808- SOLAS_SAMSUNG_0005821;YILMAZ_00000403-YILMAZ_00000416
SOLAS_SAMSUNG_0005597- SOLAS_SAMSUNG_0005598;YILMAZ_00000103-YILMAZ_00000104
SOLAS_SAMSUNG_0005599- SOLAS_SAMSUNG_0005613;YILMAZ_00000105-YILMAZ_00000119
SOLAS_SAMSUNG_0005517;YILMAZ_00000022
SOLAS_SAMSUNG_0005518- SOLAS_SAMSUNG_0005576;YILMAZ_00000023-YILMAZ_00000081
SOLAS_SAMSUNG_0005683- SOLAS_SAMSUNG_0005698;YILMAZ_00000193-YILMAZ_00000208
SOLAS_SAMSUNG_0005754- SOLAS_SAMSUNG_0005764;YILMAZ_00000349-YILMAZ_00000359
SOLAS_SAMSUNG_0005769- SOLAS_SAMSUNG_0005773;YILMAZ_00000364-YILMAZ_00000368
SOLAS_SAMSUNG_0005765- SOLAS_SAMSUNG_0005768;YILMAZ_00000360-YILMAZ_00000363

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SOLAS_SAMSUNG_0005779;YILMAZ_00000369-YILMAZ_00000374
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SOLAS_SAMSUNG_0005583;YILMAZ_00000085-YILMAZ_00000089
SOLAS_SAMSUNG_0005584-
SOLAS_SAMSUNG_0005596;YILMAZ_00000090-YILMAZ_00000102
SOLAS_SAMSUNG_0005614-
SOLAS_SAMSUNG_0005616;YILMAZ_00000120-YILMAZ_00000122
SOLAS_SAMSUNG_0005617-
SOLAS_SAMSUNG_0005631;YILMAZ_00000123-YILMAZ_00000137
SOLAS_SAMSUNG_0005632-
SOLAS_SAMSUNG_0005659;YILMAZ_00000138-YILMAZ_00000165
SOLAS_SAMSUNG_0005666-
SOLAS_SAMSUNG_0005676;YILMAZ_00000172-YILMAZ_00000182
SOLAS_SAMSUNG_0005679-
SOLAS_SAMSUNG_0005682;YILMAZ_00000185-YILMAZ_00000188
SOLAS_SAMSUNG_0005677;YILMAZ_00000183
SOLAS_SAMSUNG_0005678;YILMAZ_00000184
SOLAS_SAMSUNG_0005780-
SOLAS_SAMSUNG_0005782;YILMAZ_00000375-YILMAZ_00000377
SOLAS_SAMSUNG_0005699-
SOLAS_SAMSUNG_0005700;YILMAZ_00000209-YILMAZ_00000210
SOLAS_SAMSUNG_0005718-
SOLAS_SAMSUNG_0005721;YILMAZ_00000268-YILMAZ_00000271
SOLAS_SAMSUNG_0005745;YILMAZ_00000336
YILMAZ_00000327-YILMAZ_00000334
SOLAS_SAMSUNG_0005717;YILMAZ_00000264
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SOLAS_SAMSUNG_0005707;YILMAZ_00000213-YILMAZ_00000217
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SOLAS_SAMSUNG_0005736;YILMAZ_00000309-YILMAZ_00000310
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YILMAZ_00000262-YILMAZ_00000263
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SOLAS_SAMSUNG_0005797;YILMAZ_00000392
SOLAS_SAMSUNG_0005802;YILMAZ_00000397
SOLAS_SAMSUNG_0005804;YILMAZ_00000399
SOLAS_SAMSUNG_0005798;YILMAZ_00000393
SOLAS_SAMSUNG_0005795;YILMAZ_00000390
SOLAS_SAMSUNG_0005801;YILMAZ_00000396
SOLAS_SAMSUNG_0005794;YILMAZ_00000389
SOLAS_SAMSUNG_0005807;YILMAZ_00000402
SOLAS_SAMSUNG_0005800;YILMAZ_00000395
SOLAS_SAMSUNG_0005799;YILMAZ_00000394
SOLAS_SAMSUNG_0005793;YILMAZ_00000388
SOLAS_SAMSUNG_0005785;YILMAZ_00000380
SOLAS_SAMSUNG_0005805;YILMAZ_00000400
SOLAS_SAMSUNG_0005806;YILMAZ_00000401
SOLAS_SAMSUNG_0005787-
SOLAS_SAMSUNG_0005788;YILMAZ_00000382-YILMAZ_00000383
SOLAS_SAMSUNG_0005786;YILMAZ_00000381
SOLAS_SAMSUNG_0005790;YILMAZ_00000385
SOLAS_SAMSUNG_0005803;YILMAZ_00000398
SOLAS_SAMSUNG_0005789;YILMAZ_00000384
SOLAS_SAMSUNG_0005791;YILMAZ_00000386
SOLAS_SAMSUNG_0005792;YILMAZ_00000387
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SOLAS_SAMSUNG_0005749;YILMAZ_00000341-YILMAZ_00000344
SOLAS_SAMSUNG_0005750-
SOLAS_SAMSUNG_0005753;YILMAZ_00000345-YILMAZ_00000348
YILMAZ_00000015
YILMAZ_00000016
YILMAZ_00000014
YILMAZ_00000001

YILMAZ_00000002-YILMAZ_00000006
YILMAZ_00000011-YILMAZ_00000013
YILMAZ_00000007-YILMAZ_00000010

A diligent search continues for documents, and Solas reserves the right to supplement this response.

**C. P.R. 3-2(c) Documents**

The file histories for the '338 and '311 patents may be found in Solas's production at SOLAS\_SAMSUNG\_0000001-SOLAS\_SAMSUNG\_0000970. The file history for the '450 patent may be found in Solas's production at SOLAS\_SAMSUNG\_0000971-SOLAS\_SAMSUNG\_0001338.

Dated: May 17, 2019

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### **CERTIFICATE OF SERVICE**

The undersigned certifies that on May 17, 2020, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via electronic mail.

/s/ Reza Mirzaie  
Reza Mirzaie